

PUBLICATION

Hot Topics in OSHA Include Cold Weather Guidance

February 13, 2014

OSHA has issued guidance to employers related to the dangers of cold stress. If you have employees who must work outside during cold temperatures, be aware that OSHA may consider those employees to be exposed to a recognized hazard of frostbite or hypothermia. OSHA does not have a specific standard related to cold stress; however, OSHA can always cite employers pursuant to the general duty clause, otherwise known as Section 5(a)(1) of the Occupational Safety and Health Act.

What can employers do to avoid citations? Here are a few tips:

- Train employees on recognition of conditions that can lead to cold stress.
- Train employees on the signs and symptoms of cold stress.
- Train employees on proper clothing to protect from cold stress.
- Monitor employees for signs and symptoms of cold stress.
- Schedule work during warmer portions of the day with adequate break periods.
- Provide engineering controls such as radiant heaters.
- Provide warm beverages.

Be aware of OSHA's guidance documents related to cold stress, available [here](#). Following OSHA's guidance will not only protect your employees, but also make it very difficult for OSHA to sustain a general duty clause violation against your company.

On the regulatory front, OSHA extended the deadline to submit comments on the proposed silica rule until February 11, 2014. This rule has been very contentious due to the significant changes included. Look for more activity on this later this year.

February's tip for avoiding OSHA citations:

Housekeeping. The first impression that a compliance officer has about your worksite is how it looks, but did you know that there are regulations that require certain standards of housekeeping? In particular, 29 CFR 1910.22, requires employers to keep floors and aisles clear, as well as ensuring that passageways and aisles are adequately marked.